

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

GUADALUPE RIVER RESORT RANCH, LTD.	§	
	§	
	§	
VS.	§	CIVIL NO. 5:17-cv-1058
	§	
PHILADELPHIA INDEMNITY INSURANCE COMPANY	§	
	§	

ON REMOVAL FROM:

CAUSE NO. 17-443

GUADALUPE RIVER RESORT RANCH, LTD.	§	IN THE DISTRICT COURT
	§	
	§	
VS.	§	KENDALL COUNTY, TEXAS
	§	
PHILADELPHIA INDEMNITY INSURANCE COMPANY	§	451ST JUDICIAL DISTRICT
	§	

EXHIBIT 1

AFFIDAVIT IN SUPPORT OF REMOVAL

AFFIDAVIT OF EUGENE ANGIOLILLO

STATE OF PENNSYLVANIA §
 §
COUNTY OF MONTGOMERY §

BEFORE ME, the undersigned authority, personally appeared EUGENE ANGIOLILLO, known to me to be the person whose name is subscribed below, and who upon his oath stated as follows:

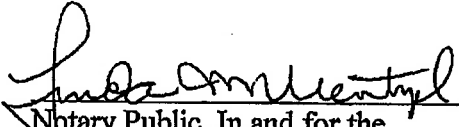
1. "My name is Eugene Angiolillo. I am over the age of twenty-one years and competent to make this affidavit.
2. I am a Property Claims Supervisor for Philadelphia Indemnity Insurance Company. In that capacity, I am authorized to make this affidavit.
3. Philadelphia Indemnity Insurance Company is an affiliated company of Philadelphia Consolidated Holding Company. In handling property insurance claims, I frequently represent the interests of Philadelphia Indemnity Insurance Company and its insureds. Based upon that activity and experience, the matters stated in this affidavit are based on personal knowledge and are true and correct.
4. Philadelphia Indemnity Insurance Company is a corporation, which is incorporated under the laws of the state of Pennsylvania.
5. Philadelphia Indemnity Insurance Company maintains its principal place of business at One Bala Plaza, Suite 100, Bala Cynwyd, Pennsylvania. That is also the address of the office building where I work for Philadelphia Indemnity Insurance Company.
6. At no time since 2008, when I began handling claims for Philadelphia Indemnity Insurance Company, has that company maintained its principal place of business in Texas.
7. Attached to this affidavit is a true and correct copy of the current listing from the Texas Department of Insurance website for Philadelphia Indemnity Insurance Company. It correctly identifies that company as a foreign company authorized to engage in the business of insurance in Texas. It also correctly states that the company's "home state" is Pennsylvania.

Further, Affiant sayeth not."

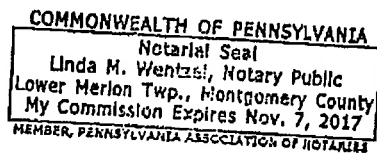


EUGENE ANGIOLILLO

SUBSCRIBED AND SWORN to before me on this the 24 day of April,
2017, to certify which witness my hand and seal of office.



Notary Public, In and for the
State of Pennsylvania



Texas Department of Insurance

333 Guadalupe St. P.O. Box 149104 Austin, TX 78714-9104

PHILADELPHIA INDEMNITY INSURANCE COMPANY

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General Information:

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Type of Entity:	Fire and Casualty (FC)
Status of TX License:	Active
Company Status:	Normal Operations
License Number:	5570
NAIC Number:	18058
TDI Company Number:	5570
FEIN:	231738402
Home City/State:	PA
Origin:	Foreign
Date Incorporated/Organized:	02/10/1927
Date Licensed/Eligible/Registered in Texas:	05/01/1991
Date Cancelled/Ineligible/Inactive:	

Contact Information:

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Mailing Address:	C/O Tmna Services Llc 3 Bala Plaza East Suite 400 Bala Cynwyd PA 19004-3400
Office Number:	(610)617-7900
Toll Free Number:	(800)873-4552
Fax Number:	(610)617-7940

Types of Insurance Licensed to Write:

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- Accident
- Aircraft Liability
- Aircraft Physical Damage
- Allied Coverages
- Auto Physical Damage
- Automobile Liability
- Boiler & Machinery
- Burglary & Theft
- Credit
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- Fidelity & Surety
- Fire
- Forgery
- Glass
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- Liability Other than Auto
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Use of Credit:

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C T Corporation System
1999 Bryan Street Suite 900
Dallas TX 75201 -3136

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The following organizations rate insurance companies on their financial strength and stability. Some of these companies charge for their services.

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